

Keith C. Owens (Bar No 184841)
Nicholas A. Koffroth (Bar No. 287854)
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kowens@foxrothschild.com
nkoffroth@foxrothschild.com

*Counsel for Richard A. Marshack,
Liquidation Trustee of the LPG Liquidation
Trust*

**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA DIVISION**

In re

**THE LITIGATION PRACTICE
GROUP P.C.,**

Debtor.

Case No.: 8:23-bk-10571-SC

Chapter 11

**DECLARATION OF NICHOLAS A.
KOFFROTH IN SUPPORT MOTION
FOR ENTRY OF ORDER ENFORCING
AGREEMENT OF PURCHASE AND
SALE AND JOINT ESCROW
INSTRUCTION, AND COMPELLING
MORNING LAW GROUP, P.C. TO
MAKE PAYMENT THEREUNDER AND
RELATED RELIEF**

Date: April 23, 2025

Time: 1:30 p.m.

Judge: Hon. Scott C. Clarkson

Place: Courtroom 5C

411 W. Fourth Street
Santa Ana, CA 92701

1 I, Nicholas A. Koffroth, declare as follows:

2 1. I am a partner at the offices of Fox Rothschild LLP, counsel to Richard A. Marshack,
3 Liquidating Trustee (the "Trustee") of the LPG Liquidating Trust (the "Trust"), in the above-captioned
4 bankruptcy case (the "Bankruptcy Case") of The Litigation Practice Group P.C. (the "Debtor"). I make
5 this declaration in support of the Trustee's *Motion for Entry of Order Enforcing the Agreement of*
6 *Purchase and Sale and Joint Escrow Instruction, and Compelling Morning Law Group, P.C. to Make*
7 *Payment Thereunder and Related Relief* (the "Motion").¹ I am over the age of 18, except as otherwise
8 indicated herein I have personal knowledge of the facts set forth herein or have obtained familiarity
9 with such facts from persons knowledgeable of them, and if called upon to testify, could and would do
10 so.

11 2. On January 23, 2025, I emailed counsel to MLG concerning payment of the Undisputed
12 Payment. Attached hereto as **Exhibit "1"** is a true and correct copy of the e-mail chain between me
13 and counsel for MLG regarding the request for payment of the Undisputed Payment. As of the date of
14 this Declaration, I have not received further communication from counsel to MLG concerning the
15 Undisputed Payment other than as set forth in Exhibit 1.

16 I declare under penalty of perjury that the foregoing is true and correct.

17 Executed this 2nd day of April 2025.

18
19 /s/ Nicholas A. Koffroth

Nicholas A. Koffroth

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26
27
28 ¹ Capitalized terms not defined herein have the meanings assigned to them in the Motion.

EXHIBIT 1

From: [Shechtman, Zev M.](#)
To: [Koffroth, Nicholas A.](#)
Cc: [Owens, Keith C.](#); [Adam Meislik](#); [Chad Kurtz](#); [Christopher.Celentino@dinsmore.com](#); [Ghio, Christopher](#); [Joshua Armstrong](#)
Subject: [EXT] RE: LPG: PSA Payment Q4 2024
Date: Wednesday, March 26, 2025 2:55:41 PM

Hi Nick,
I will inquire with MLG and get back to you ASAP.
Thanks,
Zev

Zev M. Shechtman

Partner

SAUL EWING LLP | Los Angeles

Office: [\(310\) 255-6130](tel:3102556130)

From: Koffroth, Nicholas A. <NKoffroth@foxrothschild.com>
Sent: Wednesday, March 26, 2025 1:26 PM
To: Shechtman, Zev M. <zev.shechtman@saul.com>
Cc: Owens, Keith C. <KOwens@foxrothschild.com>; Adam Meislik <ameislik@force10partners.com>; Chad Kurtz <ckurtz@force10partners.com>; Christopher.Celentino@dinsmore.com; Ghio, Christopher <Christopher.Ghio@Dinsmore.com>; Joshua Armstrong <Joshua.Armstrong@morninglawgroup.com>
Subject: RE: LPG: PSA Payment Q4 2024

Zev:

We have not received a response. Can you let us know about the status of payment and the agreement you referenced? We will make ourselves available for a call this week if that would be helpful.

Thank you,

Nick





Nicholas A Koffroth

Partner

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 (310) 556-9828

 nkoffroth@foxrothschild.com

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From: Koffroth, Nicholas A.

Sent: Wednesday, February 5, 2025 2:14 PM

To: 'Shechtman, Zev M.' <zev.shechtman@saul.com>

Cc: Owens, Keith C. <KOwens@foxrothschild.com>; 'Adam Meislik' <ameislik@force10partners.com>; 'Chad Kurtz' <ckurtz@force10partners.com>; 'Christopher.Celentino@dinsmore.com' <Christopher.Celentino@DINSMORE.COM>; 'Ghio, Christopher' <Christopher.Ghio@Dinsmore.com>; 'Joshua Armstrong' <Joshua.Armstrong@morninglawgroup.com>

Subject: RE: LPG: PSA Payment Q4 2024

Zev:

Following-up again.





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From: Koffroth, Nicholas A.

Sent: Monday, February 3, 2025 2:04 PM

To: 'Shechtman, Zev M.' <zev.shechtman@saull.com>

Cc: Owens, Keith C. <KOwens@foxrothschild.com>; 'Adam Meislik'

<ameislik@force10partners.com>; 'Chad Kurtz' <ckurtz@force10partners.com>;

'Christopher.Celentino@dinsmore.com' <Christopher.Celentino@DINSMORE.COM>; 'Ghio,

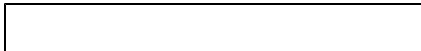
Christopher' <Christopher.Ghio@Dinsmore.com>; 'Joshua Armstrong'

<Joshua.Armstrong@morninglawgroup.com>

Subject: RE: LPG: PSA Payment Q4 2024

Zev:

Following up on this.




Nicholas A Koffroth


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From: Koffroth, Nicholas A.

Sent: Friday, January 31, 2025 12:10 PM

To: Shechtman, Zev M. <zev.shechtman@saull.com>

Cc: Owens, Keith C. <KOwens@foxrothschild.com>; Adam Meislik <ameislik@force10partners.com>;

Chad Kurtz <ckurtz@force10partners.com>; Christopher.Celentino@dinsmore.com; Ghio,

Christopher <Christopher.Ghio@Dinsmore.com>; Joshua Armstrong

<Joshua.Armstrong@morninglawgroup.com>

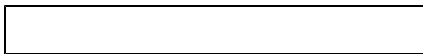
Subject: RE: LPG: PSA Payment Q4 2024

Zev:

We are unaware of any such approved agreement. Please provide us with any documentation of the agreement. We understand that there was no Court approval of the agreement referenced below, but please provide if we are missing it.

Thank you,

Nick



Nicholas A Koffroth

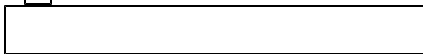
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From: Shechtman, Zev M. <zev.shechtman@saull.com>

Sent: Friday, January 31, 2025 12:03 PM

To: Koffroth, Nicholas A. <NKoffroth@foxrothschild.com>

Cc: Owens, Keith C. <KOwens@foxrothschild.com>; Adam Meislik <ameislik@force10partners.com>;
Chad Kurtz <ckurtz@force10partners.com>; Christopher.Celentino@dinsmore.com; Ghio,
Christopher <Christopher.Ghio@Dinsmore.com>; Joshua Armstrong
<Joshua.Armstrong@morninglawgroup.com>

Subject: [EXT] RE: LPG: PSA Payment Q4 2024

Hi Nick,

I'm copying Trustee's counsel so that everyone is in the loop. In June 2024, when the Trustee and

MLG agreed to postpone mediation, they also agreed that: payment of any other Fees that may come due under Section 2(b) of the APA shall be postponed until after the mediation concludes and shall not be payable until the 15th day after the end of Q1 2025 (i.e., April 15, 2025).

Regards,

Zev

Zev M. Shechtman

Partner

SAUL EWING LLP | Los Angeles

Office: [\(310\) 255-6130](tel:(310)255-6130)

From: Koffroth, Nicholas A. <NKoffroth@foxrothschild.com>

Sent: Friday, January 31, 2025 9:09 AM

To: Shechtman, Zev M. <zev.shechtman@saul.com>

Cc: Owens, Keith C. <KOwens@foxrothschild.com>; Adam Meislik <ameislik@force10partners.com>;
Chad Kurtz <ckurtz@force10partners.com>

Subject: RE: LPG: PSA Payment Q4 2024

****EXTERNAL EMAIL** - This message originates from outside our Firm. Please consider carefully before responding or clicking links/attachments.**

Zev:

Following up on this. We have not received a response.

Thank you,

Nick




Nicholas A Koffroth

Partner

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 nkoffroth@foxrothschild.com

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From: Koffroth, Nicholas A. <NKoffroth@foxrothschild.com>
Sent: Thursday, January 23, 2025 3:56 PM
To: Zev Shechtman (Zev.Shechtman@saul.com) <Zev.Shechtman@saul.com>
Cc: Owens, Keith C. <KOwens@foxrothschild.com>; Adam Meislik <ameislik@force10partners.com>;
Chad Kurtz <ckurtz@force10partners.com>
Subject: LPG: PSA Payment Q4 2024

Zev:

I hope you are doing well. We understand that MLG calculates an undisputed amount owed to the Trust under the *Agreement of Purchase and Sale* [Docket No. 416] (the “PSA”) in the amount of \$953,247.59 for the quarter ended December 31, 2024. Pursuant to Section 2(b) of the PSA, we understand payment of this undisputed amount is due within 15 days of the end of each fiscal quarter. For this period, that would be January 15, 2025, which has now passed.

We understand there are other disputes about the fee calculation and that parties reserve rights with respect to those disputes and disputed amounts. However, with respect to this undisputed portion, please let us know when the Trust can expect payment.

Thank you,

Nick



Nicholas A Koffroth

Partner

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"Saul Ewing LLP (saul.com)" has made the following annotations:

+~~~~~+

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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 10250 Constellation Boulevard, Suite 900, Los Angeles, CA 90067.

A true and correct copy of the foregoing documents entitled: DECLARATION OF NICHOLAS A. KOFFROTH IN SUPPORT OF MOTION FOR ENTRY OF ORDER ENFORCING AGREEMENT OF PURCHASE AND SALE AND JOINT ESCROW INSTRUCTION, AND COMPELLING MORNING LAW GROUP, P.C. TO MAKE PAYMENT THEREUNDER AND RELATED RELIEF on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On 4/02/2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Kyra E Andrassy** kandrassy@raineslaw.com, bclark@raineslaw.com;jfisher@raineslaw.com
- **Bradford Barnhardt** bbarnhardt@marshackhays.com, bbarnhardt@ecf.courtdrive.com, alinares@ecf.courtdrive.com
- **Eric Bensamochan** eric@eblawfirm.us, G63723@notify.cincompass.com
- **Michael Jay Berger** michael.berger@bankruptcy.com, yathida.nipha@bankruptcy.com;michael.berger@ecf.inforuptcy.com
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- **Jacob Newsum-Bothamley** jacob.bothamley@dinsmore.com, bonnie.connolly@dinsmore.com
- **Queenie K Ng** queenie.k.ng@usdoj.gov
- **Israel Orozco** israel@iolawcorp.com

- **Keith C Owens** kowens@foxrothschild.com, khoang@foxrothschild.com
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- **Vanessa Rodriguez** vanessa.rodriguez@dinsmore.com, angelica.urena@dinsmore.com
- **Kevin Alan Rogers** krogers@wellsmar.com
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- **Olivia Scott** olivia.scott@hklaw.com
- **Jonathan Serrano** jonathan.serrano@dinsmore.com
- **Maureen J Shanahan** Mstotaro@aol.com
- **Paul R Shankman** PShankman@fortislaw.com, info@fortislaw.com
- **Zev Shechtman** Zev.Shechtman@saul.com, zshechtman@ecf.inforuptcy.com; hannah.richmond@saul.com
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- **Leslie Skorheim** leslie.skorheim@usdoj.gov
- **Adam D Stein-Sapir** info@pflc.com
- **Howard Steinberg** steinbergh@gtlaw.com, pearsallt@gtlaw.com; NEF-BK@gtlaw.com; howard-steinberg-6096@ecf.pacerpro.com
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- **Matthew J Stockl** matthew.stockl@dinsmore.com, katrice.ortiz@dinsmore.com
- **Michael R Totaro** Ocbkatty@aol.com
- **United States Trustee (SA)** ustpreion16.sa.ecf@usdoj.gov
- **William J Wall** wwall@wall-law.com
- **Sharon Z. Weiss** sharon.weiss@bclplaw.com, raul.morales@bclplaw.com, REC_KM_ECF_SMO@bclplaw.com
- **Johnny White** JWhite@wrslawyers.com, jlee@wrslawyers.com
- **Reina Zepeda** rzepeda@omniagnt.com

2. SERVED BY UNITED STATES MAIL: On 4/02/2025, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows.

See attached for additional parties

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on 1/08/2025, I served the following persons and/or entities by personal delivery, mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

The Honorable Scott C. Clarkson
United States Bankruptcy Court, Central District of California
411 West Fourth Street, Suite 5130 / Courtroom 5C
Santa Ana, CA 92701-4593

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

4/02/2025

Kimberly Hoang

/s/ Kimberly Hoang

Date

Printed Name

Signature

Additional Parties Served by U.S. Mail

Creditors who have the 20 largest unsecured claims

Debt Validation Fund II, LLC
5075 Lower Valley Road,
Atglen, PA 19310

MC DVI Fund 1, LLC; MC
DVI Fund 2, LLC
598 Cottonwood Dr.,
Glenview, IL 60026

Validation Partners LLC
1300 Sawgrass Pkwy, Ste. 110
Sunrise, FL 33323

Marich Bein LLC
99 Wall Street, Ste 2669
New York, NY 10005

Business Centers of America
1100 Sir Francis Drake Blvd,
Ste 1, Kentfield, CA 94904

JP Morgan Chase
3 Park Plaza, Ste 900
Irvine, CA 92614

CA Franchise Tax Board
PO Box 942857
Sacramento, CA 94257-0511

Outsource Accelerator Ltd
City Marque Limited
Unit 8801-2 Bldg. 244-248
Des Voeux Rd.
Central Hong Kong

Collaboration Advisors
400 Dorla Court
Zephyr Cove, NV 89448

Anthem Blue Cross
PO Box 511300
Los Angeles, CA 90051-7855

1 Azevedo Solutions Groups, Inc.
2 420 Adobe Canyon Rd.
3 Kenwood, CA 95452

4 Debt Pay Pro
5 1900 E Golf Road, Suite 550
6 Schaumburg, IL 60173

7 Sharp Business Systems
8 8670 Argent St
9 Santee, CA 92071

10 Tustin Executive Center
11 1630 S Sunkist Steet, Ste A
12 Anaheim, CA 92806

13 Exela Enterprise Solutions
14 2701 E. Grauwlyer Road
15 Irving, TX 75061

16 Netsuite-Oracle
17 2300 Oracle Way
18 Austin, TX 78741

19 Credit Reporting Service Inc
20 548 Market St, Suite 72907
21 San Francisco, CA 94104-5401

22 Document Fulfillment Services
23 2930 Ramona Ave #100
24 Sacramento, CA 95826

25 Executive Center LLC
26 5960 South Jones Blvd
27 Las Vegas, NV 89118

28 LexisNexus
15500 B Rockfield Blvd
Irvine, CA 92618

Secured Creditors

Diverse Capital LLC
323 Sunny Isles Blvd., Suite 503
Sunny Isles, FL 33154

City Capital NY
1135 Kane Concourse
Bay Harbour Islands, FL 33154